

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION OBJECTING DOCKET NO. 19353 AND INFORMING CURE  
AMOUNTS FOR EXECUTORY CONTRACTS OR UNEXPIRED LEASES TO  
BE ASSUMED WITH SERVICENTRO CIALES, INC. PURSUANT TO TITLE  
III PLAN OF ADJUSTMENT**

TO THE HONORABLE LAURA TAYLOR  
SWAIN, UNITED STATES DISTRICT JUDGE:

COMES NOW, ORLANDO SANTIAGO AMADOR (“Mr. Santiago”), secured creditor of **Servicentro Ciales, Inc.** represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. Through motion dated November 23, 2021 (the “Motion”) (Dkt. # 19353) notice was given by the Financial Oversight and Management Board, as sole representative of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority (collectively the “Debtors”) to all affected parties of the executory contracts and unexpired leases to be assumed pursuant to Exhibit E (the “Schedule”) of the Second Amended Plan Supplement and **Exhibit A** to the Motion.

2. The Motion further informed that the Debtors had conducted a review of their books and records and have determined that the cure amount for unpaid monetary obligations due and/or that could have been sought in accordance with Executory Contracts or the Unexpired Leases is as set forth in **Exhibit A** to the Motion.

3. The Motion further provided that any interested party disagreeing with the proposed Cure Costs or the assumption of the Executory Contracts or Unexpired Leases affecting such party had to file an objection which, *inter alia*, had to state with specificity the nature of the objection and, if the objection pertains to the proposed Cure Costs, state the correct cure amount alleged to be owed, together with any applicable and appropriate documentation in support thereof.

4. Mr. Santiago Amador is Servicentro Ciales’s secured creditor with interest in accounts receivable and rents generated by Servicentro Ciales and a holder of a judgment in its favor in the case C CD2011-0455.

5. In compliance with the Motion, and as party in interest, Mr. Santiago Amador hereby informs that it hereby objects the proposed Cure Costs contained in **Exhibit A** to the Motion as it regards its executory contracts or unexpired leases to be assumed by the Debtor with Servicentro Ciales, Inc.

6. It is hereby given notice that the Cure Costs regarding its executory contracts or unexpired lease to be assumed by the Debtors amounts to a total sum of no less than

**\$543,750.00 (Five Hundred Forty Three Thousand Seven Hundred Fifty Dollars and Cero Cents as of December 1, 2021, as per Exhibit 1 attached hereto.**

7. Such Cure Costs encompass the Servicentro Ciales contract with “Departamento de la Familia” of the Commonwealth of Puerto Rico.

8. Due to information, documents and discussion with “Departamento de la Familia” no additional rent payment has been disbursed regarding months November 2017 forth.

9. No prior request for the relief sought herein has been made to this Court or to any other court.

10. That the amounts owed to Servicentro Ciales, Inc. should be consigned at the First Instance First Court, Subsection of Arecibo in the civil case no. C CD2011-0455, for proper distribution pursuant such State Court’s mandate.

WHEREFORE, ORLANDO SANTIAGO AMADOR (“Mr. Santiago”), secured creditor of **Servicentro Ciales, Inc.**, respectfully requests that this Court ALLOW the Cure Costs itemized herein in their entirety, and order the payment of the same as provided for in any confirmed Plan of Adjustment, in order for the proper assumption by the Debtors of the executory contracts or unexpired leases involved, with any other appropriate relief in favor of movant herein, including that any disbursement should be consigned at the First Instance First Court, Subsection of Arecibo in the civil case no. C CD2011-0455, for proper distribution pursuant such State Court’s mandate.

**Certificate of Service:** Notice has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtors’ claims and noticing agent, as may be applicable; be served upon the Office of the United States Trustee for the District of Puerto Rico, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, PR 00901.

Dated: December 13, 2021

Respectfully submitted,

Counsel for Orlando Santiago Amador

**S/ Alexis A. Betancourt Vincenty**

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